

I support media diversity

I am writing to you today to comment on Docket No. 02-277, The Biennial Review of the FCC's broadcast media ownership rules. In its goals to promote competition, diversity and localism in today's media market, I strongly believe that the FCC should retain all of the current media ownership rules now in question. These rules serve the public interest by limiting the market power of already huge companies in the broadcast industry.

I do not believe that the studies commissioned by the FCC accurately demonstrate the negative affects media deregulation and consolidation have had on media diversity. While there may be indeed be more sources of media than ever before, the spectrum of views presented have become more limited.

There is already cross-ownership among cable networks. For example, ESPN -- which includes ESPN, ESPN2, and ESPN Classic -- is owned by the Disney Company, which also owns ABC. The Fox Sports networks -- which here in California include Fox Sports West and Fox Sports West 2 -- are owned by the Fox TV network, which also owns the FX cable network. The WB network is owned by AOL-Time-Warner, which also owns the HBO and Cinemax cable networks, as well as the TBS Superstation, the several CNN networks, and Turner Classic Movies.

There are other cross-ownership situations, as well. While, in some cases, they may actually represent a greater diversity of programming, in many cases they do not. HBO, Cinemax, Showtime, and the Movie Channel continue to show many of the low quality films that they showed back in the mid-1980's, mainly due to cost considerations. Much of the news and sports content is shared among the conglomerates' common networks, so that even though there are three or four sports networks, they all show the same events, and their reporting and event coverage is identical among them.

Radio presents a similar consolidation of programming and talent. Clear Channel, with its 1200+ radio stations across the country, has eliminated scores of jobs among its stations, using a small cadre of announcers to "voice track" programs out of a single facility and then insert local advertising at the various affiliates. While network television provided the model for such programming, at least television stations still maintain some local news coverage. Such has not been the case among radio stations. Large markets such as Los Angeles, New York, Detroit, and Chicago have all-news stations to supplement the array of talk programs, music programs, and other programs which permeate their airwaves. Smaller markets, however, don't have that luxury.

By and large, radio has fragmented itself under the mistaken belief that people who like to listen to a certain form of music don't want to have it interrupted by news broadcasts. Many of those music and entertainment stations provide a few minutes of news and traffic information during the traditional commute periods of 6-9 a.m. and 3-6 p.m., but the news is considerable less than was provided prior to 1990. Allowing further consolidation within the radio spectrum will further limit the amount of news being presented, which in turn will further limit the public's ability to make informed decisions.

The right to carry on informed debate and discussion of current events is

part of the founding philosophy of our nation. Our forefathers believed that democracy was best served by a diverse marketplace of ideas. If the FCC allows our media outlets to merge, our ability to have open, informed discussion with a wide variety of viewpoints will be compromised.

The public interest will best be served by preserving media ownership rules in question in this proceeding.

In addition to the official hearing on this matter in Richmond, VA, I strongly urge the FCC to hold additional hearings elsewhere around the nation to solicit the widest possible participation from the public which will be the most directly affected by the outcomes of these decisions. I think it is important for the FCC to not only consider the points of view of those with a financial interest in this issue, but also those with a social or civic interest.

With the serious impact these rule changes will have on our democracy, it is incumbent on the Commission to take the time to review these issues more thoroughly and allow the American people to have a meaningful say in the process.

Thank you,

Robert A. O'Brien